

**LAW OFFICES OF SOLOFF & ZERVANOS**

John N. Zervanos, Esquire

Identification No.# 49615

Jeffrey P. Fritz, Esquire

Identification No.#78124

1525 Locust Street, 8th Floor

Philadelphia, PA 19102

(215) 732-2260 Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT FOR THE**

**EASTERN DISTRICT OF PENNSYLVANIA**

**ALAN FEHR :**

6365 Chestnut Hill Road :

Coopersburg, PA 18036 :

Plaintiff :

vs. : NO. 02-3145

:

**TANNEWITZ, INC. :**

0794 Chicago Drive :

Jenison, MI 49428 : Defendant :

## **JOINT PRE-TRIAL DISCLOSURE MEMORANDUM**

A. Parties anticipate they will require the use of a VCR and television during the course of the trial. There are, at least, two videotapes which demonstrate the operation of the machine. We have also discussed the matter of bringing the subject hydra-cut saw into the courtroom. While there has been discussion about possibly operating the saw before the jury, we have not yet determined whether this will be necessary or even possible. Considering the parameters of the Court's order, however, we would like to put the court on notice that the issue of the machine's operation maybe raised at the time of trial.

B. Parties do not intend to use any type of software or like presentation during the course of the trial.

C. There are number of witnesses in Grand Rapids, Michigan. Plaintiff will request that various members of Tannewitz's staff be present for trial. Defense counsel has indicated that he does not believe that anyone other than the president of the company, Morris Pysarchik will be present during the course of trial. Accordingly, we are requesting use of video conference equipment for the various witnesses whom plaintiff intends to question during the course of his case in chief vis a vis video conference. It is anticipated that 1-3 witnesses will participate by video conference.

D. As indicated above, there has been some discussion between the parties that the subject Hydra-cut saw may be presented to the jury during the course of trial. While we do not believe that we will operate the machine because of power source limitations, we are requesting with the courts permission that the subject machine be present for the jurors' inspection.

Respectfully submitted,

Dated:

JOHN N. ZERVANOS, ESQUIRE

Attorney for Plaintiff

Dated:

CHRISTOPHER WRIGHT, ESQUIRE

Attorney for Defendant